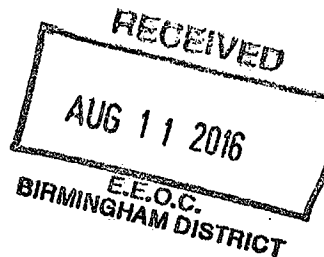


EXHIBIT A

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: _____ Agency(ies) Charge No(s): _____ <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
and EEOC			
State or local Agency, if any			
Name (Indicate Mr., Ms., Mrs.)		Home Phone (Incl. Area Code)	Date of Birth
William Cortez Gipson		Redacted	Redacted 188
Street Address		City, State and ZIP Code	
Redacted			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two are named, list under PARTICULARS below.)			
Name		No. Employees, Members	Phone No. (Incl. Area Code)
Hyundai Power Transformers USA, Inc.		500+	(334) 481-2000
Street Address		City, State and ZIP Code	
215 Folmar Parkway, Montgomery, Alabama 36105			
Name		No. Employees, Members	Phone No. (Incl. Area Code)
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).)			DATE(S) DISCRIMINATION TOOK PLACE
<input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify) _____			Earliest Latest Jan 1, 2012 July 20, 2016 <input checked="" type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):			
See attached Exhibit "A"			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State or Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Date <u>08/11/16</u> Charging Party Signature <u>William Gipson</u>		SIGNATURE OF COMPLAINANT	
		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	



EXHIBIT

“A”

RECEIVED

AUG 11 2016

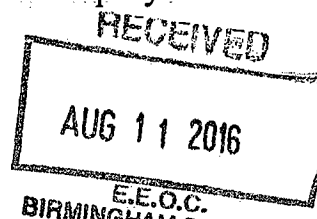
E.E.O.C.
BIRMINGHAM DISTRICT

My name is William Gipson. I am an African American male. I am employed by Hyundai Power Transformers in Montgomery, Alabama. I began my employment with the company in 2011. For the first nine (9) months of my employment, I trained in Korea for the positions I've held in my current department (Winding). In the past five (5) years, I have been promoted slowly and the company has selected Caucasian employees with less experience and seniority over me and promoted them to higher positions.

I started my career with the company in a production line position (\$11.00 per hour) while training in Korea. When I returned to the United States from Korea in September 2011, I received a \$2.00 pay increase (\$13.00 per hour). Within the first six (6) months of returning from Korea, I was promoted to Team Leader (\$15.00 per hour). Sometime in 2012, the plant started hiring supervisors and hired Caucasian employees over me even though I had the requisite experience and training.

In 2014, I was promoted to Supervisor along with another employee, a white male named Clayton Payne ("Payne"). Payne and I trained in Korea together at the same time. While training in Korea, I received multiple awards for excellence in learning how to perform the job I was assigned. I was also selected as the top trainee in the entire training class. To my knowledge, Payne did not receive awards for his performance.

After approximately one (1) year as a supervisor, Payne was promoted to Senior Supervisor. To my knowledge, this position never existed prior to 2015. The company created this position for Payne even though I had at least seven (7) more months of experience as a team leader. In addition, upper management requires employees working in the Winding Department to clock in and out using a time clock. Payne was often late to work, an issue that became known to upper management upon review of his time sheet. While working as a team leader, Payne dropped two (2) copper windings, parts used to operate electricity transformers. These particular windings weighed approximately six (6) tons and were valued at \$50,000 - \$100,000. The company had to replace one of the windings and the other winding required repairs. Per company policy, employees responsible for damage to company property valuing over \$500.00 receive an automatic disciplinary write-up. To my knowledge, Payne was not written up. All of the aforementioned incidents occurred prior to Payne becoming Senior Supervisor. In addition, Payne frequently uses the racially derogatory term "boy" when addressing African American employees. He does not use this term when talking to Caucasian employees.

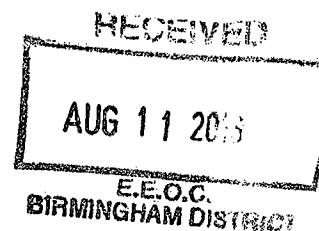


Upon assuming his new position, Payne promoted another white male, an employee named Luther Skull, from Team Leader to Supervisor, filling the position Payne previously held. At this point, Payne became my boss. Prior to Payne becoming my supervisor, he and I both ran a production line in the winding shop. During this time, my shift would consistently out perform Payne's shift. As a result, Payne would complain to upper management that he did not like the employees that he managed during his shift. In response, the company allowed Payne to hand-pick employees that I managed during my shift to work on his shift. This happened on at least (3) separate occasions.

Once Payne became my supervisor, he began treating me adversely and undermining my authority with my team. He also tried to change my fixed schedule and required me to work more on the weekends. The company allowed Payne to take off on some of the weekend shifts he was already assigned. As a result, I was required to work those shifts. I am also aware of other Caucasian employees who are paid significantly more than me and who were promoted to higher positions over me. In addition, I know of a black fork-lift driver whom, at the instruction of another employee, raised a fork-lift too high and damaged the rack on the fork-lift. This employee was written up immediately by the Safety Director, Ronnie Martin. Mr. Martin is a white male and he is the same person who would have been responsible for writing up Payne when he damaged the two (2) copper windings on the job.

In June 2016, I complained of race discrimination by Payne to Tony Wojciechowski, Senior Human Resources Manager, Mr. Park the CEO and Ted Arkuszeski, the Plant Manager. My complaints were ignored. However, approximately one (1) month after I complained, I was demoted from Supervisor to Team Leader and received a cut in pay from \$24.00 to \$23.00 per hour. I asked the company to provide me with a reason for my demotion, but was refused. Payne was not demoted and he is currently making \$26.00 per hour.

During the time that I was working as a team leader in the Winding Department, the company transferred a Caucasian male, Bobby White, from Georgia to work as a Team Leader. White was paid \$27.00 per hour. In stark contrast, I was paid \$22.00 per hour to perform the very same job.



Sometime in 2014, approximately thirty (30) employees working under Payne signed a petition complaining of the way Payne treated them as their supervisor. The employees presented the petition to Tony Wojciechowski in Human Resources. Thereafter, human resources provided Payne with a copy of the petition which listed all of the names of the complainants. Upon receipt, Payne verbally expressed that he was out to get everyone that signed the petition against him. To my knowledge, Payne was neither investigated nor disciplined following this petition. Rather, the company allowed Payne to remain in his position as a supervisor. In addition, the company allowed Payne to terminate some of the African American employees that signed the petition.

Sometime in 2014, Plant Manager, Ted Arkuszeski, instructed me to review evaluation scores of African American employees and score them lower so he could terminate them. I refused because there was no reason to score the employees lower.

I am being subjected to ongoing race discrimination and harassment. I have been disciplined and demoted due to my race. I have been subjected to adverse terms and conditions during my employment and paid less due to my race. It is my belief that others, similarly situated are also being harassed and discriminated due to their race as well.

